

IN THE UNITED STATES COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

JENAM TECH, LLC	§	
	§	
VS.	§	CAUSE NO. 4:19-cv-250 [ALM/KPJ]
	§	
SAMSUNG ELECTRONICS CO., LTD. and	§	PATENT CASE
SAMSUNG ELECTRONICS AMERICA, INC.	§	
<i>Defendants.</i>		

**PLAINTIFF’S UNOPPOSED MOTION FOR STAY
AND EXTENSION OF CASE DEADLINES**

On October 1, 2019, Plaintiff Jenam Tech, LLC (“Jenam”) filed an unopposed motion to stay the case deadlines. On October 8, 2019, the Court granted the motion to stay up to and including October 31, 2019. (Dkt. No. 31) In its order, the Court set a date for a Rule 26 Meeting Joint Report and case schedule due by October 31, 2019.

On October 30, 2019, Jenam informed Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, “Samsung”) that Jenam’s new counsel needs some additional time to become familiar with the facts and status of the case.

In discussing the issues, the Parties came to agreement on the following terms:

1. If acceptable to the Court, all outstanding dates in this matter will be stayed up to and including November 8, 2019.
2. The deadline for Samsung to file any motion to transfer would be extended to and including November 12, 2019.
3. At the end of the stay period referenced in item #1 above, on November 8, 2019, the parties will provide a status report to the Court with a proposal on a schedule going forward.
4. The Parties request that the Rule 16 Management Conference be rescheduled for a

date and time convenient to the Court after the parties provide the status report referenced in item #3 above.

WHEREFORE, Plaintiff Jenam Tech LLC requests that the Court enter the attached order approving the parties' agreement as set forth above.

Dated: October 31, 2019

Respectfully submitted,

By: /s/
Jeffrey G. Toler
Texas Bar No. 24011201
TOLER LAW GROUP, PC
8500 Bluffstone Cove, Suite A201
Austin, Texas 78759
Tel. (512) 327-5515
Fax (512) 327-5575
jtoler@tlgiplaw.com
ATTORNEYS FOR PLAINTIFF
JENAM TECH LLC

CERTIFICATE OF CONFERENCE

Plaintiff states that (1) counsel has complied with the meet and confer requirements of Local Rule CV-7(h), and (2) Defendant Samsung is unopposed to the relief sought by this motion.

By: /s/
Jeffrey G. Toler

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel of record who have consented to electronic service as this district requires. Local Rule CV-5(a)(3)(A).

Dated: October 31, 2019

Respectfully submitted,

By: /s/
Jeffrey G. Toler
Texas Bar No. 24011201
TOLER LAW GROUP, PC
8500 Bluffstone Cove, Suite A201
Austin, Texas 78759
Tel. (512) 327-5515
Fax (512) 327-5575
jtoler@tlgiplaw.com
ATTORNEYS FOR PLAINTIFF
JENAM TECH LLC